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May 18, 2022

Via ECF

Hon. Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *K.A., et al. v. City of New York, et al.*, 16-cv-04936 (LTS) (JW) (SDNY)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, the Corporation Counsel of the City of New York, assigned to the defense of the above-referenced action on behalf of defendant City of New York (the "City"). I am writing to respectfully request, with the consent of plaintiffs, that the Court extend the time for the City to move to dismiss the Second Amended Complaint, from May 23, 2022 to May 30, 2022 ((with the briefing schedule as set forth below).

The Corizon defendants join in this request so that all defendants may file their papers at the same time. Plaintiffs' counsel consents to this request. This is the third application for an extension of this deadline; the prior applications were granted upon consent.

The request is made because, as noted in the Corizon defendants' letter of May 6 2022 (ECF No. 135), I came down with Covid-19 after returning from a trip to Poland, and was not working due to illness during the week of May 2, 2022. I resumed working, in part, on May 9 and May 10, but on May 11 symptoms resumed. On May 12, 2022, I was medically diagnosed with a relapse and required to take further leave. I returned to work, in part and remotely, on May 16. As a result of the unexpected extension of my illness, further time is required for the City to complete its submission on the motion to dismiss.

The proposed briefing schedule is:

Motion to Dismiss Due: May 30, 2022

Opposition to Motion Due June 29, 2022

Reply to Opposition Due July 14, 2022 (one day added for July 4 holiday)

We thank the Court for its consideration of this matter.

Respectfully submitted,

Alan H. Scheiner /s/

Alan H. Scheiner
Senior Counsel
Special Federal Litigation Division

cc: All Counsel (via ECF)

The foregoing extension request is granted. Briefing shall follow the schedule set out above. DE 137 is resolved.

SO ORDERED.

5/18/2022

/s/ Laura Taylor Swain, Chief USDJ